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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

**COLLEGIUM FUND SERIES 32, a Nevada
limited-liability company.**

Plaintiff.

v.

MARK DANIEL SNYDER, an individual;
WELLS FARGO BANK, N.A.; DOES I
THROUGH X; and ROE
CORPORATIONS 1 THROUGH 10.

Defendants.

Case No.: 2:16-cv-01640-JCM-PAL

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
FEDERAL HOME LOAN
MORTGAGE CORPORATION'S
MOTION FOR SUMMARY
JUDGMENT**

(THIRD REQUEST)

WELLS FARGO BANK, N.A., a national
banking association.

Counter-Claimants.

V.

COLLEGIUM FUND SERIES 32, a Nevada limited-liability company, ABSOLUTE COLLECTION SERVICES, LLC, a Nevada limited liability company; NUEVO VISTA HOMEOWNERS ASSOCIATION, INC., a Nevada non-profit cooperative corporation,

Counter-Defendants.

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1 FEDERAL HOME LOAN MORTGAGE
 2 CORPORATION,

3 Counter-Claimants,

4 v.

5 COLLEGIUM FUND SERIES 32, a Nevada
 6 limited-liability company, ABSOLUTE
 7 COLLECTION SERVICES, LLC, a Nevada
 limited liability company; NUEVO VISTA
 HOMEOWNERS ASSOCIATION, INC., a
 Nevada non-profit cooperative corporation,

8 Counter-Defendants.

9 Wells Fargo Bank, N.A. (“Wells Fargo”), Federal Home Loan Mortgage Corporation
 10 (“Freddie Mac”), Collegium Fund LLC, Series 32 (“Collegium Fund”), Absolute Collection
 11 Services, LLC (“ACS”), and Nuevo Vista Homeowners Association, Inc. (the “HOA”), by and
 through their respective counsel, hereby respectfully request that the Court enter an order, pursuant
 to Local Rules 6-1 and 7-1, extending the time for Collegium Fund, ACS, and the HOA to respond
 to the Motion for Summary Judgment (the “MSJ”) filed by Freddie Mac on January 17, 2017 [ECF
 No. 26] and joined by Wells Fargo on January 20, 2017 [ECF No. 29]. The response to the MSJ is
 currently due on March 28, 2017. The Parties have agreed to extend this response date to April 18,
 2017.

18 The extension is being sought in good faith and will not unduly delay this litigation. Freddie
 19 Mac recently discovered additional documents that may be responsive to Collegium Fund’s
 20 discovery requests. Collegium Fund, the HOA, and ACS would like time to review these additional
 21 documents before responding to the MSJ. Freddie Mac has now reviewed the documents and
 22 produced them by mail on March 23, 2017. The requested extension will give Collegium Fund, the
 23 HOA, and ACS roughly three weeks from receiving the document until responding to the MSJ.

24 Accordingly, the Parties respectfully request that the Court grant this Stipulation and extend
 25 the time to respond to the MSJ from March 28, 2017 to April 18, 2017.

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1 DATED this 29th day of March, 2017.

2 CONNAGHAN|NEWBERRY

3 /s/Paul R. Connaghan (with permission)

4 Paul R. Connaghan, Esq.

Nevada Bar No. 3229

5 Tara D. Newberry, Esq.

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7 Attorneys for Collegium #32

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/s/ Nathan G. Kanute

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8 ABSOLUTE COLLECTION SERVICES, LLC

PENGILLY LAW FIRM

9 /s/ Shane D. Cox (with permission)

10 Shane D. Cox, Esq.

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12 Attorneys for Absolute Collection Services

/s/ Elizabeth B. Lowell (with permission)

Elizabeth B. Lowell, Esq.

Nevada Bar No. 8551

David Markman, Esq.

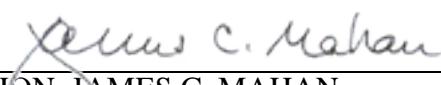
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13 1995 Village Center Circle, Ste. 190

Las Vegas, NV 89134

14 Attorneys for Nuevo Vista HOA

15 IT IS SO ORDERED.

16 
JAMES C. MAHAN

17 HON. JAMES C. MAHAN
UNITED STATES DISTRICT COURT JUDGE

18 DATED: March 30, 2017

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CERTIFICATE OF SERVICE

As an employee of Snell & Wilmer L.L.P., I certify that I served a copy of the foregoing
STIPULATION AND ORDER TO EXTEND TIME TO RESPOND TO FEDERAL HOME
LOAN MORTGAGE CORPORATION'S MOTION FOR SUMMARY JUDGMENT on the
29th day of March, 2017 by the method indicated:

- BY FAX:** by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m. pursuant to EDCR Rule 7.26(a). A printed transmission record is attached to the file copy of this document(s).
- BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Reno, Nevada addressed as set forth below.
- BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.
- BY PERSONAL DELIVERY:** by causing personal delivery by _____, a messenger service with which this firm maintains an account, of the document(s) listed above to the person(s) at the address(es) set forth below.
- BY ELECTRONIC SUBMISSION:** submitted to the above-entitled Court for electronic filing and service upon the Court's Service List for the above-referenced case.

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/s/ Lara J. Taylor
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